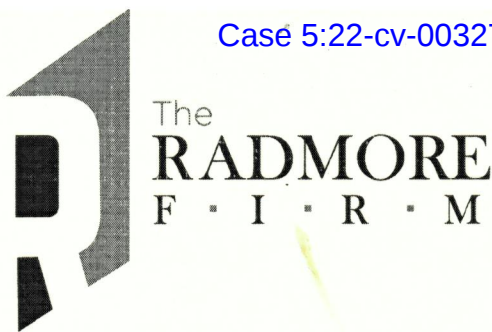


EXHIBIT A



Philadelphia, PA
P: 215.568.9900
P: 1.800.Radmore
F: 215.568.4546

Mt. Laurel, NJ
P: 856.424.4434
F: 856.751.5357

James R. Radmore, Esq.
JRR@Radmore.net
philadelphiainjurylaw.com

OF COUNSEL

- Benjamin N. Gialloredo, Esq
- Ramon D. Townsend, Esq
- Eleanor T. Segal, Esq, RN
- Joyce J. Sweinberg, Esq
- Joseph Boardman, Esq
(1956-2021)

January 6, 2022

Target
650 W. Cuthbert Boulevard
Haddon Township, NJ 08108

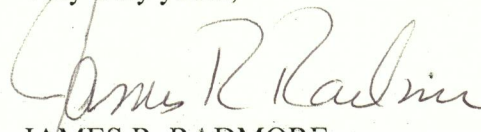
RE: Craig Pukanecz vs. Target, Target Corporation, Kimco Realty Corporation and Serenity
Property Services, LLC
CCP Philadelphia County - No. 220100097

Dear Sir/Madam:

Pursuant to the current Rules of Civil Procedure, I enclose herewith a copy of a Civil
Action Complaint, the original of which has been filed of record by my office in the above-
captioned matter.

You are hereby notified that you have been sued in Court, and you must take action
within twenty (20) days from your receipt of this letter, or a Default Judgment may be entered
against you.

Very truly yours,


JAMES R. RADMORE

JRR/msh
Enclosure

**SENT REGULAR MAIL AND
CERTIFIED MAIL
RETURN RECEIPT REQUESTED
7020 0640 0001 7396 6078**



Court of Common Pleas of Philadelphia County
Trial Division**Civil Cover Sheet**

For Prothonotary Use Only (Docket Number)

JANUARY 2022**000097**

E-Filing Number: 2201002093

PLAINTIFF'S NAME CRAIG PUKANECZ		DEFENDANT'S NAME TARGET	
PLAINTIFF'S ADDRESS 1000 POSTAL ROAD UNIT 90413 ALLENTOWN PA 18109		DEFENDANT'S ADDRESS 650 W. CUTHBERT BOULEVARD HADDON TOWNSHIP NJ 08108	
PLAINTIFF'S NAME		DEFENDANT'S NAME TARGET CORPORATION	
PLAINTIFF'S ADDRESS		DEFENDANT'S ADDRESS C/O CT CORPORATION 600 NORTH SECOND STREET HARRISBURG PA 17101	
PLAINTIFF'S NAME		DEFENDANT'S NAME KIMCO REALTY CORPORATION	
PLAINTIFF'S ADDRESS		DEFENDANT'S ADDRESS C/O CT CORPORATION 600 NORTH SECOND STREET HARRISBURG PA 17101	
TOTAL NUMBER OF PLAINTIFFS 1	TOTAL NUMBER OF DEFENDANTS 4	COMMENCEMENT OF ACTION <input checked="" type="checkbox"/> Complaint <input type="checkbox"/> Petition Action <input type="checkbox"/> Notice of Appeal <input type="checkbox"/> Writ of Summons <input type="checkbox"/> Transfer From Other Jurisdictions	
AMOUNT IN CONTROVERSY <input type="checkbox"/> \$50,000.00 or less <input checked="" type="checkbox"/> More than \$50,000.00	COURT PROGRAMS <input type="checkbox"/> Arbitration <input type="checkbox"/> Mass Tort <input type="checkbox"/> Commerce <input type="checkbox"/> Settlement <input type="checkbox"/> Jury <input type="checkbox"/> Savings Action <input type="checkbox"/> Minor Court Appeal <input type="checkbox"/> Minors <input checked="" type="checkbox"/> Non-Jury <input type="checkbox"/> Petition <input type="checkbox"/> Statutory Appeals <input type="checkbox"/> W/D/Survival <input type="checkbox"/> Other:		
CASE TYPE AND CODE 2S - PREMISES LIABILITY, SLIP/FALL			
STATUTORY BASIS FOR CAUSE OF ACTION			
RELATED PENDING CASES (LIST BY CASE CAPTION AND DOCKET NUMBER)		IS CASE SUBJECT TO COORDINATION ORDER? YES NO	
		FILED PRO PROTHY JAN 03 2022 S. RICE	
TO THE PROTHONOTARY: Kindly enter my appearance on behalf of Plaintiff/Petitioner/Appellant: <u>CRAIG PUKANECZ</u> Papers may be served at the address set forth below.			
NAME OF PLAINTIFF'S/PETITIONER'S/APPELLANT'S ATTORNEY JAMES R. RADMORE		ADDRESS JAMES R. RADMORE, P.C. TWO PENN CENTER PLAZA 1500 J.F.K. BLVD.-SUITE 520 PHILADELPHIA PA 19102	
PHONE NUMBER (215) 568-9900	FAX NUMBER (215) 568-4546		
SUPREME COURT IDENTIFICATION NO. 36649		E-MAIL ADDRESS jrr@radmore.net	
SIGNATURE OF FILING ATTORNEY OR PARTY JAMES RADMORE		DATE SUBMITTED Monday, January 03, 2022, 03:13 pm	

FINAL COPY (Approved by the Prothonotary Clerk)

COMPLETE LIST OF DEFENDANTS:

1. TARGET
650 W. CUTHBERT BOULEVARD
HADDON TOWNSHIP NJ 08108
2. TARGET CORPORATION
C/O CT CORPORATION 600 NORTH SECOND STREET
HARRISBURG PA 17101
3. KIMCO REALTY CORPORATION
C/O CT CORPORATION 600 NORTH SECOND STREET
HARRISBURG PA 17101
4. SERENITY PROPERTY SERVICES, LLC
30 GEORGIA O'KEEFE WAY
MARLTON NJ 08053

**MAJOR NON JURY
ASSESSMENT OF DAMAGES
HEARING REQUIRED**

Filed and Attested by the
Office of Judicial Records
03 JAN 2022 03:13 pm
S. RICE

**THE RADMORE FIRM, LLC
BY: JAMES R. RADMORE, ESQUIRE
ID#: 36649
Two Penn Center, Suite 312
1500 J.F.K. Boulevard
Philadelphia, PA 19102**

Attorney for Plaintiff(s)

**CRAIG PUKANECZ
1000 Postal Road, Unit 90413
Allentown, PA 18109**

**COURT OF COMMON PLEAS
PHILADELPHIA COUNTY**

VS

**TARGET
650 W. Cuthbert Boulevard
Haddon Township, NJ 08108
and
TARGET CORPORATION
c/o CT Corporation
600 North Second Street
Harrisburg, PA 17101
and
KIMCO REALTY CORPORATION
c/o CT Corporation
600 North Second Street
Harrisburg, PA 17101
and
SERENITY PROPERTY SERVICES, LLC
30 Georgia O'Keefe Way
Marlton, NJ 08053**

TERM,

NO.

**CIVIL ACTION COMPLAINT
PREMISES LIABILITY**

NOTICE

You have been sued in court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this complaint and notice are served, by entering a written appearance personally or by attorney and filing in writing with the court your defenses or objections to the claims set forth against you by the court without further notice for any money claimed in the complaint or for any other claim or relief requested by the plaintiff. You may lose money or property or other rights important to you.

**YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE.
IF YOU DO NOT HAVE A LAWYER OR CANNOT AFFORD ONE,
GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW TO
FIND OUT WHERE YOU CAN GET LEGAL HELP.**

**PHILADELPHIA BAR ASSOCIATION
LAWYER REFERRAL AND INFORMATION SERVICE
One Reading Center
Philadelphia, Pennsylvania 19107
Telephone: 215-238-6333
TRY: 215-451-6197**

AVISO

Le han demandado a usted en la corte. Si usted quiere defenderse de estas de estas demandas expuestas en las paginas siguientes, usted tiene veinte (20) dias de plazo al partir de la fecha de la demanda y la notificacion. Hace falta asentar una comparencia escrita o en persona o con un abogado y entregar a la corte en forma escrita sus defensas o sus objeciones a las demandas en contra de su persona. Sea avisado que si usted no se defiende, la corte tomara medidas y puede continuar la demanda en contra suya sin previo aviso o notificacion. Ademas, la cortes puede decidir a favor del demandante y requiere que usted compla con todas las provisiones de esta demanda. Usted puede perder dinero o sus propiedades u otros defechos importantes para usted. LLEVE ESTA DEMANDA A UN ABOGADO INMEDIATAMENT. SINO TIENE ABOGADO O SINO TIENE EL DINERO SUFICIENTE DE PAGAR TAL SERVICIO, VAYA EN PERSONA O LLAME POR TELEFONO A LA OFICINA CUYA DIRECCION SE ENCUENTRA ESCRITA ABAJO PARA AVERIGUAR DONDE SE PUEDE CONSEGUIR ASISTENCIA LEGAL.

**ASOCIACION DE LICENCIADOS DE FILADELFA
SERVICIO DE REFERENCIA E INFORMACION LEGAL
One Reading Center
Filadelfia, Pennsylvania 19107
Telefono: 215-238-6333
TTY: 215-451-6197**

1. Plaintiff, Craig Pukanecz, is an adult individual residing at the above-captioned address.

2. Defendant, Target, is a business entity, with offices located at the above-captioned address.

3. Defendant, Target Corporation, is a corporation, in the Commonwealth of Pennsylvania, with offices located at the above-captioned address.

4. Defendant, Kimco Realty Corporation, is a corporation, in the Commonwealth of Pennsylvania, with offices located at the above-captioned address.

5. Defendant, Serenity Property Services, LLC, is a business entity with offices located at the above-captioned address.

6. On or about January 8, 2020, defendants, owned, leased and/or maintained the premises of 650 W. Cuthbert Boulevard, Haddon Township, New Jersey 08108.

7. On the aforesaid date, plaintiff, Craig Pukanecz, was lawfully walking on the premises of the aforesaid location when the ice covered condition of the parking lot caused him to slip, trip, stumble, fall and/or otherwise sustain injuries by reason of coming in contact with the negligent, hazardous and dangerous condition which was present on the parking lot, which the defendants knew or should have known was present on the parking lot.

8. Plaintiff believes and therefore avers that the aforesaid defendants, had, or should have had, notice of the existence of said negligent, hazardous, and dangerous condition which existed on the aforesaid parking lot prior to the happening of said accident.

9. The carelessness, recklessness, and negligence of the defendants, as herein alleged, consisted of the following:

- a. Failing to properly inspect the said parking lot and the adjacent area;
- b. Failing to correct the negligent or hazardous condition which they were aware or should have been aware;
- c. Failing to warn pedestrians of the negligent or hazardous condition of the said parking lot at the point where the plaintiff fell;
- d. Failing to maintain the parking lot in a condition which would protect and safeguard persons lawfully upon the parking lot and prevent them from falling.

e. Allowing and permitting the aforesaid negligent condition to remain on the aforesaid parking lot so as to constitute a menace, danger, nuisance or trap to persons lawfully upon the said parking lot.

f. Creating a hazardous condition and failing to warn the Plaintiff of said condition.

g. Otherwise failing to exercise due and proper care under the circumstances.

10. By reason of the aforesaid, the plaintiff suffered severe and permanent injuries to his back, including but not limited to limited to aggravation to anterior and posterior compression of L4-S1, as well as injuries to be set forth during the course of discovery, all of which caused him and will in the future cause him great pain and agony, and has prevented him and will in the future prevent him from attending to his daily duties to his great financial loss and damage.

11. As a result of the aforesaid occurrence, the plaintiff has been compelled, in order to effectuate a cure for the aforesaid injuries, to expend large sums of money for medicine and medical attention and may be required to expend additional sums for the same purpose in the future.

12. As a result of the aforesaid occurrence, the plaintiff has been prevented from attending to his usual daily activities and duties, and may be so prevented for an indefinite period of time in the future, all to his great detriment and loss.

13. As a result of the aforesaid occurrence, the plaintiff has suffered physical pain and mental anguish and humiliation and may continue to suffer same for an indefinite period of time in the future.

14. On information and belief, the actions of defendants as set forth above and various customs or policies of defendants demonstrated the deliberate indifference of defendants to safety and welfare of individuals such as plaintiff.

15. The conduct of the defendants was an outrageous, willful and/or reckless disregard of plaintiff's interests; thus providing for an award of punitive damages.

WHEREFORE, plaintiff demands judgment from the defendants in an amount in excess of Fifty Thousand (\$50,000.00) Dollars.

Respectfully submitted,

THE RADMORE FIRM, LLC

BY: \s\James R. Radmore
JAMES R. RADMORE
Attorney for Plaintiffs

Case ID: 220100097

VERIFICATION

JAMES R. RADMORE, ESQUIRE, hereby states that he is the attorney for the Plaintiff(s) in this action and verifies that the statements made in the foregoing pleading are true and correct to the best of his knowledge, information and belief. The undersigned understands that the statements therein are made subject to the penalties of 18 Pa. C.S. 4940 relating to unsworn falsification to authorities.

\s\James R. Radmore
JAMES R. RADMORE, ESQUIRE



**Service of Process
Transmittal**

01/20/2022

CT Log Number 540909807

TO: CATHY SCHUDA
Target Corporation
1000 NICOLLET MALL, MS: TPS-3155
MINNEAPOLIS, MN 55403-2542

RE: Process Served in Pennsylvania

FOR: Target Corporation (Domestic State: MN)

ENCLOSED ARE COPIES OF LEGAL PROCESS RECEIVED BY THE STATUTORY AGENT OF THE ABOVE COMPANY AS FOLLOWS:

TITLE OF ACTION: Re: CRAIG PUKANECZ // To: Target Corporation

DOCUMENT(S) SERVED: --

COURT/AGENCY: None Specified
Case # 220100097

NATURE OF ACTION: Personal Injury - Failure to Maintain Premises in a Safe Condition

ON WHOM PROCESS WAS SERVED: CT Corporation System, Harrisburg, PA

DATE AND HOUR OF SERVICE: By Process Server on 01/20/2022 at 14:16

JURISDICTION SERVED : Pennsylvania

APPEARANCE OR ANSWER DUE: None Specified

ATTORNEY(S) / SENDER(S): None Specified

ACTION ITEMS: CT has retained the current log, Retain Date: 01/20/2022, Expected Purge Date: 01/25/2022

Image SOP

Email Notification, Non Employee Litigation Target gl.legal@target.com

REGISTERED AGENT ADDRESS: CT Corporation System
600 N. 2nd Street
Suite 401
Harrisburg, PA 17101
877-564-7529
MajorAccountTeam2@wolterskluwer.com

The information contained in this Transmittal is provided by CT for quick reference only. It does not constitute a legal opinion, and should not otherwise be relied on, as to the nature of action, the amount of damages, the answer date, or any other information contained in the included documents. The recipient(s) of this form is responsible for reviewing and interpreting the included documents and taking appropriate action, including consulting with its legal and other advisors as necessary. CT disclaims all liability for the information contained in this form, including for any omissions or inaccuracies that may be contained therein.



Service Intended for: TARGET CORPORATION

Court of Common Pleas of Philadelphia County
Trial Division**Civil Cover Sheet**

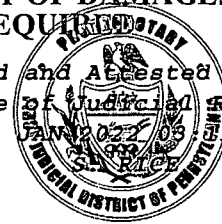
For Prothonotary Use Only (Docket Number)	
JANUARY 2022	000097
E-Filing Number: 2201002093	
PLAINTIFF'S NAME CRAIG PUKANECZ	DEFENDANT'S NAME TARGET
PLAINTIFF'S ADDRESS 1000 POSTAL ROAD UNIT 90413 ALLENTOWN PA 18109	DEFENDANT'S ADDRESS 650 W. CUTHBERT BOULEVARD HADDON TOWNSHIP NJ 08108
PLAINTIFF'S NAME	DEFENDANT'S NAME TARGET CORPORATION
PLAINTIFF'S ADDRESS	DEFENDANT'S ADDRESS C/O CT CORPORATION 600 NORTH SECOND STREET HARRISBURG PA 17101
PLAINTIFF'S NAME	DEFENDANT'S NAME KIMCO REALTY CORPORATION
PLAINTIFF'S ADDRESS	DEFENDANT'S ADDRESS C/O CT CORPORATION 600 NORTH SECOND STREET HARRISBURG PA 17101
TOTAL NUMBER OF PLAINTIFFS 1	TOTAL NUMBER OF DEFENDANTS 4
COMMENCEMENT OF ACTION <input checked="" type="checkbox"/> Complaint <input type="checkbox"/> Writ of Summons <input type="checkbox"/> Petition Action <input type="checkbox"/> Transfer From Other Jurisdictions <input type="checkbox"/> Notice of Appeal	
AMOUNT IN CONTROVERSY <input type="checkbox"/> \$50,000.00 or less <input checked="" type="checkbox"/> More than \$50,000.00	COURT PROGRAMS <input type="checkbox"/> Arbitration <input type="checkbox"/> Jury <input checked="" type="checkbox"/> Non-Jury <input type="checkbox"/> Other:
CASE TYPE AND CODE 2S - PREMISES LIABILITY SLIP/FALL	
STATUTORY BASIS FOR CAUSE OF ACTION	
RELATED PENDING CASES (LIST BY CASE CAPTION AND DOCKET NUMBER)	
IS CASE SUBJECT TO COORDINATION ORDER? YES NO	
TO THE PROTHONOTARY: Kindly enter my appearance on behalf of Plaintiff/Petitioner/Appellant: <u>CRAIG PUKANECZ</u> Papers may be served at the address set forth below.	
NAME OF PLAINTIFF'S/PETITIONER'S/APPELLANT'S ATTORNEY JAMES R. RADMORE	ADDRESS JAMES R. RADMORE, P.C. TWO PENN CENTER PLAZA 1500 J.F.K. BLVD.-SUITE 520 PHILADELPHIA PA 19102
PHONE NUMBER (215) 568-9900	FAX NUMBER (215) 568-4546
SUPREME COURT IDENTIFICATION NO. 36649	E-MAIL ADDRESS jrr@radmore.net
SIGNATURE OF FILING ATTORNEY OR PARTY JAMES RADMORE	DATE SUBMITTED Monday, January 03, 2022, 03:13 pm

COMPLETE LIST OF DEFENDANTS:

1. TARGET
650 W. CUTHBERT BOULEVARD
HADDON TOWNSHIP NJ 08108
2. TARGET CORPORATION
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HARRISBURG PA 17101
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C/O CT CORPORATION 600 NORTH SECOND STREET
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4. SERENITY PROPERTY SERVICES, LLC
30 GEORGIA O'KEEFE WAY
MARLTON NJ 08053

**MAJOR NON JURY
ASSESSMENT OF DAMAGES
HEARING REQUIRED**

Filed and Attested by the
Office of Judicial Records
03 JAN 27 2022 3 pm



THE RADMORE FIRM, LLC
BY: JAMES R. RADMORE, ESQUIRE
ID#: 36649
Two Penn Center, Suite 312
1500 J.F.K. Boulevard
Philadelphia, PA 19102

Attorney for Plaintiff(s)

CRAIG PUKANECZ
1000 Postal Road, Unit 90413
Allentown, PA 18109

**COURT OF COMMON PLEAS
PHILADELPHIA COUNTY**

vs

TARGET
650 W. Cuthbert Boulevard
Haddon Township, NJ 08108
and
TARGET CORPORATION
c/o CT Corporation
600 North Second Street
Harrisburg, PA 17101
and
KIMCO REALTY CORPORATION
c/o CT Corporation
600 North Second Street
Harrisburg, PA 17101
and
SERENITY PROPERTY SERVICES, LLC
30 Georgia O'Keefe Way
Marlton, NJ 08053

TERM,

NO.

**CIVIL ACTION COMPLAINT
PREMISES LIABILITY**

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You have been sued in court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this complaint and notice are served, by entering a written appearance personally or by attorney and filing in writing with the court your defenses or objections to the claims set forth against you by the court without further notice for any money claimed in the complaint or for any other claim or relief requested by the plaintiff. You may lose money or property or other rights important to you.

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LAWYER REFERRAL AND INFORMATION SERVICE
One Reading Center
Philadelphia, Pennsylvania 19107
Telephone: 215-238-6333
TRY: 215-451-6197

AVISO

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ASOCIACION DE LICENCIADOS DE FILADELFIA
SERVICIO DE REFERENCIA E INFORMACION LEGAL
One Reading Center
Filadelfia, Pennsylvania 19107
Telefono: 215-238-6333
TTY: 215-451-6197

1. Plaintiff, Craig Pukanecz, is an adult individual residing at the above-captioned address.
2. Defendant, Target, is a business entity, with offices located at the above-captioned address.
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7. On the aforesaid date, plaintiff, Craig Pukanecz, was lawfully walking on the premises of the aforesaid location when the ice covered condition of the parking lot caused him to slip, trip, stumble, fall and/or otherwise sustain injuries by reason of coming in contact with the negligent, hazardous and dangerous condition which was present on the parking lot, which the defendants knew or should have known was present on the parking lot.
8. Plaintiff believes and therefore avers that the aforesaid defendants, had, or should have had, notice of the existence of said negligent, hazardous, and dangerous condition which existed on the aforesaid parking lot prior to the happening of said accident.
9. The carelessness, recklessness, and negligence of the defendants, as herein alleged, consisted of the following:
 - a. Failing to properly inspect the said parking lot and the adjacent area;
 - b. Failing to correct the negligent or hazardous condition which they were aware or should have been aware;
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 - d. Failing to maintain the parking lot in a condition which would protect and safeguard persons lawfully upon the parking lot and prevent them from falling.

e. Allowing and permitting the aforesaid negligent condition to remain on the aforesaid parking lot so as to constitute a menace, danger, nuisance or trap to persons lawfully upon the said parking lot.

f. Creating a hazardous condition and failing to warn the Plaintiff of said condition.

g. Otherwise failing to exercise due and proper care under the circumstances.

10. By reason of the aforesaid, the plaintiff suffered severe and permanent injuries to his back, including but not limited to limited to aggravation to anterior and posterior compression of L4-S1, as well as injuries to be set forth during the course of discovery, all of which caused him and will in the future cause him great pain and agony, and has prevented him and will in the future prevent him from attending to his daily duties to his great financial loss and damage.

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15. The conduct of the defendants was an outrageous, willful and/or reckless disregard of plaintiff's interests; thus providing for an award of punitive damages.

WHEREFORE, plaintiff demands judgment from the defendants in an amount in excess of Fifty Thousand (\$50,000.00) Dollars.

Respectfully submitted,

THE RADMORE FIRM, LLC

BY: \sJames R. Radmore
JAMES R. RADMORE
Attorney for Plaintiffs

Case ID: 220100097

VERIFICATION

JAMES R. RADMORE, ESQUIRE, hereby states that he is the attorney for the Plaintiff(s) in this action and verifies that the statements made in the foregoing pleading are true and correct to the best of his knowledge, information and belief. The undersigned understands that the statements therein are made subject to the penalties of 18 Pa. C.S. 4940 relating to unsworn falsification to authorities.

\sJames R. Radmore
JAMES R. RADMORE, ESQUIRE